

(Eddie) Jae K. Kim (CA Bar No. 236805)
LYNCH CARPENTER, LLP
117 East Colorado Blvd., Suite 600
Pasadena, CA 91105
Tel.: (626) 550-1250
ekim@lcllp.com

Gary F. Lynch (admitted pro hac vice)
Jamisen A. Etzel (admitted pro hac vice)
Nicholas A. Colella (admitted pro hac vice)
LYNCH CARPENTER, LLP
1133 Penn Ave., 5th Floor
Pittsburgh, PA 15222
Tel.: (412) 322-9243
gary@lcllp.com
jamisen@lcllp.com
nickc@lcllp.com

Christian Levis (admitted pro hac vice)
Amanda Fiorilla (admitted pro hac vice)
Rachel Kesten (admitted pro hac vice)
Yuanchen Lu (*pro hac vice* forthcoming)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com
afiorilla@lowey.com
rkesten@lowey.com
ylu@lowey.com

Attorneys for Plaintiff and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JANE DOE II, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

FULLSTORY, INC., META PLATFORMS,
INC., TIKTOK, INC., AND BYTEDANCE
INC.,

Defendants.

Case No. 3:23-cv-00059-WHO (VKD)

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND CASE SCHEDULE**

Judge: Honorable William H. Orrick

Plaintiff Jane Doe II (“Plaintiff”) and Defendants FullStory, Inc. (“FullStory”), Meta Platforms, Inc. (“Meta”), TikTok Inc., and ByteDance Inc. (together with TikTok Inc., “TikTok”) (“collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on June 18, 2024, the Court entered a case schedule for this matter (ECF 161);

WHEREAS, the Parties are still negotiating the scope of the parties’ discovery responses and document productions, including the production of structured data;

WHEREAS, the Parties are still in the process of producing documents;

WHEREAS, the Parties have conferred and determined they will require an approximate six-month extension of time to complete discovery in this case due to the scope of the case and the technical complexity of this matter;

WHEREAS, the Parties have conferred and agreed to the following proposed modified schedule, subject to Court approval;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties through their respective counsel, subject to the Court’s approval, that the following deadlines shall be effective in this case:

Event	Current Deadline	[Proposed] Modified Deadline
Deadline for Substantial Completion Class and Fact Discovery	June 6, 2025	December 8, 2025
Expert Disclosures	August 1, 2025	February 2, 2026
Rebuttal Expert Disclosures	September 5, 2025	March 5, 2026
Completion of Expert Discovery	October 10, 2025	April 10, 2026
Deadline for Class Certification Motion	November 14, 2025	May 14, 2026
Last Day to Amend Pleadings	November 14, 2025	May 14, 2026
Class Certification Opposition	December 22, 2025	June 22, 2026
Class Certification Reply	January 12, 2026	July 13, 2026
Hearing on Class Certification	February 11, 2026	August 11, 2026
Supplemental Reports Regarding Merits – Expert Disclosure	May 1, 2026	November 2, 2026
Supplemental Reports Regarding Merits – Expert Rebuttal	June 1, 2026	December 9, 2026
Expert discovery cutoff	July 1, 2026	January 15, 2027

Event	Current Deadline	[Proposed] Modified Deadline
Dispositive/Daubert Motions to be heard	November 4, 2026 (motion 8/12/26; response 9/16/26; reply 10/15/26)	May 17, 2027 (motion 2/18/2027; response 3/25/2027; reply 04/23/2027)
Pretrial Conference	January 11, 2027 at 2:00 p.m.	July 26, 2027 at 2:00 p.m.
Trial	February 8, 2027 at 8:30 a.m. by Jury	August 23, 2027 at 8:30 a.m. by Jury

Dated: May 16, 2025

LOWEY DANNENBERG, P.C.

By: /s/ Christian Levis
 Christian Levis (admitted *pro hac vice*)
 Amanda Fiorilla (admitted *pro hac vice*)
 Rachel Kesten (admitted *pro hac vice*)
 Yuanchen Lu (*pro hac vice* forthcoming)
 44 South Broadway, Suite 1100
 White Plains, NY 10601
 Tel.: (914) 997-0500
 Fax: (914) 997-0035
 clevis@lowey.com
 afiorilla@lowey.com
 rkestn@lowey.com
 ylu@lowey.com

LYNCH CARPENTER, LLP

(Eddie) Jae K. Kim (CA Bar No. 236805)
 117 East Colorado Blvd., Suite 600
 Pasadena, CA 91105
 Tel.: (626) 550-1250
 ekim@lcllp.com

LYNCH CARPENTER, LLP

Gary F. Lynch (admitted *pro hac vice*)
 Jamisen A. Etzel (admitted *pro hac vice*)
 Nicholas A. Colella (admitted *pro hac vice*)
 1133 Penn Ave., 5th Floor
 Pittsburgh, PA 15222
 Tel.: (412) 322-9243
 gary@lcllp.com
 jamisen@lcllp.com
 nickc@lcllp.com

Attorneys for Plaintiff and the Proposed Class

Dated: May 16, 2025

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Darcy Harris
 Darcy C. Harris

LAUREN R. GOLDMAN (admitted *pro hac vice*)
 lgoldman@gibsondunn.com
 DARCY C. HARRIS (admitted *pro hac vice*)
 dharris@gibsondunn.com

200 Park Avenue
New York, NY 10166
Telephone: (212) 351-4000
Facsimile: (212) 351-4035

ELIZABETH K. MCCLOSKEY, SBN 268184
emccloskey@gibsondunn.com
ABIGAIL A. BARRERA, SBN 301746
abarrera@gibsondunn.com
One Embarcadero Center, Suite 2600
San Francisco, CA 94111
Telephone: (415) 393-8200
Facsimile: (415) 393-8306

Attorneys for Defendant Meta Platforms, Inc.

Dated: May 16, 2025

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Thomas Wakefield

Victor Jih, SBN 186515
Kelly H. Yin, SBN 328380
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
1900 Avenue of The Stars, 28th Floor
Los Angeles, CA 90067
Telephone: (424) 446-6900
Email: vjih@wsgr.com; kyin@wsgr.com

Luis Li, SBN 156081
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
633 West Fifth Street, Suite 1550
Palo Alto, CA 94306
Los Angeles, CA 90071
Telephone: (323) 210-2900
Email: luis.li@wsgr.com

Dylan Grace Savage, SBN 310452
WILSON SONSINI GOODRICH & ROSATI, P.C.
1301 Avenue of the Americas.
40th Floor
New York, NY 10019
Telephone: (212) 999-5800
Facsimile: (866) 974.7329
Email: dsavage@wsgr.com

Thomas R. Wakefield, SBN 330121

1 WILSON SONSINI GOODRICH & ROSATI
2 Professional Corporation
3 One Market Plaza, Spear Tower, Suite 3300
4 San Francisco, CA 94105
5 Telephone: (424) 446-6900
6 Email: twakefield@wsgr.com

Attorneys for Defendants TikTok Inc. and ByteDance Inc.

8 Dated: May 16, 2025

COVINGTON & BURLING LLP

9
10 By: /s/ Matthew Verdin

11 EMILY JOHNSON HENN (SBN 269482)
ehenn@cov.com
12 COVINGTON & BURLING LLP
3000 El Camino Real
13 5 Palo Alto Square, 10th Floor
Palo Alto, CA 94306-2112
14 Telephone: + 1 (650) 632-4700
Facsimile: + 1 (650) 632-4800

15 CORTLIN H. LANNIN (SBN 266488)
clannin@cov.com
16 MATTHEW Q. VERDIN (SBN 306713)
mverdin@cov.com
17 COVINGTON & BURLING LLP
Salesforce Tower
18 415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
19 Telephone: + 1 (415) 591-6000
20 Facsimile: + 1 (415) 591-6091

Attorneys for Defendant FullStory, Inc

FILER'S ATTESTATION


Pursuant to Civil Local Rule 5-1(i)(3), I, Lauren Goldman, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: May 16, 2025

By: /s/ Lauren Goldman

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 2, 2025


Hon. Judge William H. Orrick
United States District Court Judge